06/13/2018 WED 12:48 FAX 212 239 9688 Catarago Fini

Case 1:14-cv-05474-PGG Document 398 Filed 06/13/18 Page 1 of 3

Case 1;14-cv-05474-PGG Document 397-1 Filed 06/13/18 Page 1 of 3

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

HANNA BOUVENG.

Plaintiff.

v.

NYG CAPITAL LLC d/b/a NEW YORK GLOBAL GROUP, FNL MEDIA LLC, and BENJAMIN WEY

Defendants.

NYG CAPITAL LLC and BENJAMIN WEY,

Counterclaim Plaintiffs.

٧.

HANNA BOUVENG,

Counterclaim Defendant.

NYG CAPITAL LLC and BENJAMIN WEY,

Third-Party Plaintiffs,

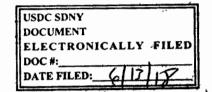
v.

THE MORELLI LAW FIRM PLLC, MORELLI ALTERS RATNER, MORELLI RATNER LAW FIRM, PLLC, MORELLI RATNER, P.C., MORELLI ALTERS RATNER P.C., MORELLI ALTERS RATNER LLP, and MORELLI LAW FIRM, PLLC,

Third-Party Defendants.

14-cv-5474 (PGG)

STIPULATION AND CONSENT ORDER WITH PERMANENT INJUNCTION



WHEREAS, all parties have agreed to resolve this action and have agreed to the entry of this Stipulation and Consent Order with Permanent Injunction:

NOW, THEREFORE, Plaintiff Hanna Bouveng ("Plaintiff" or "Counterclaim Defendant"),
Defendants NYG Capital LLC d/b/a New York Global Group, FNL Media LLC and Benjamin
Wey ("Defendants" or "NYG Parties" or "Counterclaim Plaintiffs"), and Third-Party Defendants

06/13/2018 WED 12:48 FAX 212 239 9688 Catarago Fine Ture Case 1:14-cv-05474-PGG Document 398 Filed 06/13/18 Page 2 of 3

Case 1:14-cv-05474-PGG Document 397-1 Filed 06/13/18 Page 2 of 3

The Morelli Law Firm PLLC, Morelli Alters Ratner, Morelli Ratner Law Firm, PLLC, Morelli Ratner, P.C., Morelli Alters Ratner P.C., Morelli Alters Ratner LLP, and Morelli Law Firm, PLLC (collectively the "Morelli Firm" or "Third-Party Defendants"), (Plaintiff, Defendants, and the Morelli Firm may be referred to individually as a "Party" and collectively as the "Parties"), hereby stipulate, pursuant to Federal Rule of Civil Procedure 41(a)(2), as follows:

- Plaintiff Hanna Bouveng voluntarily withdraws and dismisses with prejudice (and without costs, fees or expenses to any party) all claims asserted in this action.
- 2. The NYG Parties voluntarily withdraw and dismiss with prejudice (and without costs, fees, or expenses to any party) all claims asserted in this action including, without limitation, all counterclaims and all third-party claims asserted against the Third-Party Defendants (Dkt. No. 372).
- 3, The Judgment (Dkt. No. 249) and Amended Judgment (Dkt. No. 312) are hereby vacated, and shall be null and void and of no force or effect,
- 4. The Parties are hereby permanently enjoined as follows: The Parties shall never publish, post, republish or repost, nor cause, permit or encourage anyone else under their control to publish, post, republish or repost, anything of any kind, accurate or not, of, about, regarding or concerning the other Parties (including without limitation of, about, regarding or concerning any member of the Parties' family) in any medium of any kind. For purposes of this Stipulation and Consent Order with Permanent Injunction, the Parties are further permanently enjoined from making or causing any such publications or postings about (i) Benedict Morelli and his family; and (ii) any current lawyers of the Morelli Firm. The Court shall retain jurisdiction over the Parties to enforce this Stipulation and Consent Order with Permanent Injunction.

06/13/2018 WED 12:48 FAX 212 239 9688 Catalago Fill LLF Case 1:14-cv-05474-PGG Document 398 Filed 06/13/18 Page 3 of 3

Case 1:14-cv-05474-PGG Document 397-1 Filed 06/13/18 Page 3 of 3

5. A violation of the foregoing injunction shall subject the breaching Party to contempt of Court, and all other remedies available at law and in equity to the non-breaching Party or Parties. Nothing in this Stipulation and Consent Order with Permanent Injunction shall limit the rights and remedies of the non-breaching Party in any way.

## CATAFAGO FINI LLP

/s/ Tom M. Fini
Tom M. Fini, Esq.
Jacques Catafago, Esq.
Tom M. Fini, Esq.
The Empire State Building
350 Fifth Avenue, Suite 7710
New York, NY 10118
212-239-9669
tom@catafagofini.com
Counsel for Benjamin Wey
and NYG Capital LLC

## MORELLI LAW FIRM, PLLC

/s/ Benedict P. Morelli
Benedict P. Morelli
777 Third Avenue, 31st Floor
New York, NY 10017
212-751-9800
bmorelli@morellilaw.com
Counsel for Plaintiff

Dated: New York, New York June 12, 2018 The Clarlof Cour is dreited to close the Case.

SO ORDERED:

Paul G. Gardephe

United States District Judge

June 13, 2018